## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

CASE NO. 2014-00372

THE APPLICATION OF LOUISVILLE GAS & ELECTRIC COMPANY FOR AN ADJUSTMENT OF ELECTRIC AND GAS RATES

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## KENTUCKY SCHOOL BOARDS ASSOCIATION'S MOTION TO INTERVENE

Comes the Kentucky School Boards Association ("KSBA") pursuant to 807 KAR 5:001 Section 4(11), by counsel, and moves that it be granted leave to intervene in this matter and that it be granted full intervention. In support of this Motion, KSBA states as follows:

KSBA is a nonprofit corporation of school boards from each public school district in Kentucky. KSBA serves school board members and school districts in such areas including but not limited to energy policy. KSBA is governed by a 27-member board of directors made up of representatives elected as regional chairpersons or as directors-at-large. With nearly 900 school board members, KSBA is the largest organization of elected officials in Kentucky.

KSBA has involvement with energy initiatives with its representative school boards and electric service and other energy costs represent a significant cost of representative school district budgets. KSBA has intervened in prior LG&E rate adjustment matters as well.

In this matter the Commission is in the process of examining the request of Louisville Gas and Electric Company for a general adjustment in electric and gas base rates, significant changes in its pricing structure and other matters. Approval of this application would have a significant impact on KSBA's school board districts and their budgets. KSBA represents all of the public school boards within Louisville Gas and Electric Company's service territory. As such, KSBA has a special interest in this proceeding and KSBA's interests are not adequately represented by the other parties to this proceeding. KSBA will present issues and develop facts

that will be helpful to the Commission in fully hearing this matter, and participation by KSBA will not unduly delay these proceedings, or unduly complicate or disrupt them.

The attorneys for KSBA authorized to represent it in this proceeding and to take service of all documents are:

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Wherefore, KSBA respectfully requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

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Counsel for the Petitioner,

KENTUCKY SCHOOL BOARDS ASSOCIATION

## **CERTIFICATE OF SERVICE**

I hereby certify that that his Motion to Intervene is a true and accurate copy of the document to be mailed US Mail, postage prepaid, in paper medium with a cover letter (Read 1<sup>st</sup> Document) on December 23, 2014; that these documents were electronically submitted to the PSC on December 23, 2014 for electronic service on the following; and that there are currently no parties that have been excused from participation by electronic service.

Hon. David C. Brown Stites & Harbison, PLLC 1800 Providian Center 400 West Market Street Louisville, Kentucky 40202

Hon. Michael L. Kurtz Boehm, Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OH 45202

Hon. Greg Dutton Hon. Angela Goad Assistant Attorney General Office of the Attorney General Utility and Rate Intervention Division 1024 Capital Center Drive, Suite 200 Frankfort, Kentucky 40601-8204

Hon. Lindsey Ingram Stoll Keenon Ogden, PLLC 300 W. Vine Street Suite 2100 Lexington, KY 40507-1801

Hon. Kendrick Riggs Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W. Jefferson Street Louisville, KY 40202-2828 Hon. Allyson K. Sturgeon Senior Corporate Attorney LG&E Energy Corp. 220 W. Main Street Louisville, KY 40202

Robert Conroy Kentucky Utilities Company 220 West Main Street PO Box 32010 Louisville, Kentucky 40202

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ATTORNEY FOR KSBA